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13 Attorneys for Plaintiff JENS ERIK SORENSEN,
14 as Trustee of SORENSEN RESEARCH AND
15 DEVELOPMENT TRUST

16 UNITED STATES DISTRICT COURT
17 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

18 JENS ERIK SORENSEN, as Trustee of) Case No. 08 cv 233 BTM CAB
19 SORENSEN RESEARCH AND)
20 DEVELOPMENT TRUST,) **REQUEST FOR ENTRY OF**
21) **DEFAULT PURSUANT TO**
22) **FED.R.CIV.P. RULE 55(a) AGAINST**
23) **ALL DEFENDANTS**
24)
25)
26)
27)
28)

Plaintiff

v.

GLOBAL MACHINERY COMPANY,)
an Australian company; GMCA PTY.)
LTD., an Australian company;)
TRAPONE CORPORATION PTY.)
LTD., an Australian company; and DOES)
1 – 100,)
Defendants.)

1 TO THE CLERK:

2 PLAINTIFF Jens Erik Sorensen, as Trustee of Sorensen Research and
3 Development Trust ("SRDT") hereby requests the clerk to enter the default of the
4 following Defendants pursuant to Fed.R.Civ.P. Rule 55(a) and 55(b):

- 5 • Global Machinery Company
- 6 • GMCA Pty. Ltd.
- 7 • Trapone Corporation Pty. Ltd.

8 On February 22, 2008, Defendants were served by certified mail pursuant to
9 Fed.R.Civ.P. Rule 4 and *California Code of Civil Procedure* § 415.40. Pursuant to
10 statute, the effective date of service when certified mail service is accomplished is
11 10 days after the date of mailing, or March 4, 2008. See Docket # 17 Summons
12 Returned Executed.

13 Defendants' responsive pleading was due on or before March 24, 2008. No
14 responsive pleading compliant with Fed.R.Civ.P. Rules 8 or 12 was filed as to any
15 Defendant as reflected in the court docket, thereby placing Defendants in default.

16 WHEREFORE, Plaintiff requests the Clerk to enter the default of Defendants
17 Global Machinery Company, GMCA Pty. Ltd., and Trapone Corporation Pty. Ltd.

18 DATED this Thursday, April 03, 2008.
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21 JENS ERIK SORENSEN, as Trustee of
22 SORENSEN RESEARCH AND DEVELOPMENT
TRUST, Plaintiff

23
24 /s/ Melody A. Kramer

25 J. Michael Kaler, Esq.
26 Melody A. Kramer, Esq.
27 Attorney for Plaintiff
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PROOF OF SERVICE

I, Melody A. Kramer, declare: I am and was at the time of this service working within in the County of San Diego, California. I am over the age of 18 year and not a party to the within action. My business address is the Kramer Law Office, Inc., 9930 Mesa Rim Road, Suite 1600, San Diego, California, 92121.

On Thursday, April 03, 2008, I served the following documents:

REQUEST FOR ENTRY OF DEFAULT PURSUANT TO *FED.R.CIV.P.* RULE 55(a) AGAINST ALL DEFENDANTS

PERSON(S) SERVED	PARTY(IES) SERVED	METHOD OF SERVICE
THOMAS W. FERRELL, ESQ. tferrell@higgslaw.com HIGGS, FLETCHER & MACK LLP 401 West "A" Street, Suite 2600 San Diego, CA 92101-7913	Global Machinery Company; GMCA Pty. Ltd; Trapone Corporation Pty Ltd.	Email - Pleadings Filed with the Court via ECF
MARK G. KACHIGIAN mkachigian@hjkllaw.com CASSANDRA L. WILKINSON cwilkinson@hjkllaw.com HEAD, JOHNSON & KACHIGIAN, P.C. 228 West 17th Place Tulsa, Oklahoma 74119	Global Machinery Company; GMCA Pty. Ltd; Trapone Corporation Pty Ltd.	Email - Pleadings Filed with the Court via ECF

- ☐ (Personal Service) I caused to be personally served in a sealed envelope hand-delivered to the office of counsel during regular business hours.
- ☐ (Federal Express) I deposited or caused to be deposited today with Federal Express in a sealed envelope containing a true copy of the foregoing documents with fees fully prepaid addressed to the above noted addressee for overnight delivery.
- ☐ (Facsimile) I caused a true copy of the foregoing documents to be transmitted by facsimile machine to the above noted addressees. The facsimile transmissions were reported as complete and without error.
- ☐ (Email) I emailed a true copy of the foregoing documents to an email address represented to be the correct email address for the above noted addressee.

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2 ☒ (Email--Pleadings Filed with the Court) Pursuant to Local Rules, I electronically filed
3 this document via the CM/ECF system for the United States District Court for the
4 Southern District of California.

5 ☐ (U.S. Mail) I mailed a true copy of the foregoing documents to a mail address
6 represented to be the correct mail address for the above noted addressee.

7 I declare that the foregoing is true and correct, and that this declaration was executed on
8 Thursday, April 03, 2008, in San Diego, California.

9 /s/ Melody A. Kramer

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11 Melody A. Kramer
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